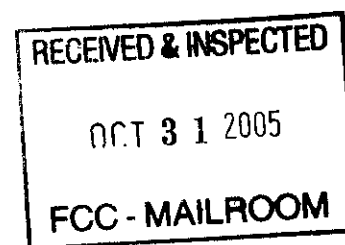


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**To:** The Commissioner of the FCC

**From:** John Inman

1117 Laurel Ave., Apt 10

Knoxville, TN 37916

**Date:** October 27, 2005

**Re:** Comment on the FCC's proposal to drop the requirement that individuals pass a telegraphy examination in order to qualify for any amateur radio operator license. WT Docket No. 05-235; 70 Fed. Reg. 51705-01.

Dear Commissioner,

I am writing to comment on the FCC's proposal to drop the five word-per-minute Morse code requirement from the license examination for all classes of amateur radio operator. I am not a radio operator. I am a graduate student with an interest in communication systems, and I would like to express my views on this proposed rule change. I support the proposed change because the current requirements probably keep more people out of amateur radio than perform any useful function. Amateur radio will be available to more people without the Morse code requirement in place. Perhaps these lighter standards can serve as an impetus for recruiting a new generation of "Hammies." Amateur radio can serve a useful function in America today, as evidenced by the recent slate of hurricanes and related communication breakdowns. Dropping the Morse code requirement is a good first step toward recruiting a new generation of amateur radio enthusiasts.

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*Amateur Radio has a place in America's emergency services network.* The recent disaster in New Orleans showed how quickly order could breakdown and lawlessness take hold in a major American city. I don't think anyone can honestly say that they expected something like New Orleans to happen in America in 2005, but after 9/11 and hurricane Katrina, it should be apparent to everyone that our government officials are not prepared for every possible disaster. If the phone lines and cell towers are down across a wide area, amateur radio is an ideal method to communicate because it is a self-contained system. It depends upon different hardware than cell phones and land phones and can be operated with battery power. No one can argue with a straight face that it would be a bad idea to have more than two methods of reaching the outside world from any given neighborhood. We have all recently seen how quickly a neighborhood can become isolated. Having more amateur radio operators spread throughout the country increases the likelihood that someone in need will be heard.

*The 5 WPM requirement keeps curious beginners from taking the next step.* By one estimate, it would take a novice six weeks, while taking a class, to learn Morse code to a proficiency of 5 WPM.<sup>1</sup> This is not an insurmountable task by any means, but it is enough to turn someone away who is just looking into a new hobby. I used to work in the golf business, and I know that the best way to turn someone with a new curiosity about golf away from the game is to tell them what they "have" to do: "You have to buy this new set of \$800 irons; Oh, you just can't think about playing a round without this new \$500 driver; You're going out without lessons? Good luck!" The best way to get

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<sup>1</sup> Phone interview with local Ham Radio operator Paul Chapman, 10/25/05.

someone interested in golf is to give her a set of cheap clubs and turn her loose on the golf course. If, after a few initial rounds, a golfer decides he or she wants to take lessons, or get new irons, or the latest driver, the fact that she came to this decision by herself will make all the difference in terms of the value she gets out of a new piece of equipment or a lesson. At the same time, a new golfer who does not take to the game is not stuck with thousands of dollars of equipment rusting in the garage. The requirement that new amateur radio users learn Morse code can have the same effect as forcing a new golfer to make a large upfront investment. The amount of money may not be equivalent, but the time it takes to learn Morse code has the same deterring effect.

Furthermore, after spending the time learning Morse, there is no guarantee that the applicant will pass the test. I spoke with a fifty-year veteran of Ham radio who told me he supported the rule change because he has a friend, a high-school teacher, who has not been able to pass the test due to the Morse requirement.<sup>2</sup> If the idea is to attract new people to the pursuit, give a kid a used transmitter and let him see if he can contact anyone. Don't sign him up for Morse code class and tell him in six weeks he might be able to join the club. But with the requirements the way they are now, that is what a new Hammy seeking a license is forced to do.

*The FCC is not preventing anyone from learning or using Morse code.* Amateur radio operators will always be able to learn Morse code and are free to use it whenever they please. The proposed rule change does not take anything away from anyone. I suppose a few of the recent licensees who struggled to pass the test will feel like they wasted their time, but at least they know their license is safe if the rule is upheld in its current form.

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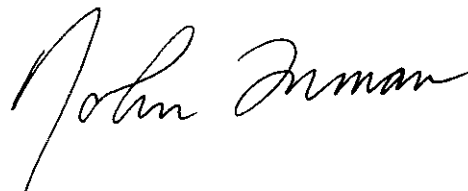
<sup>2</sup> Phone interview with local Ham radio operator Carroll Peabody, 10/25/05.

Any radio operator can use Morse code as a form of communication anytime he feels like it. In fact, there are times when Morse may be the best way to communicate. If the only thing you can do with your radio is turn it off and on so that it makes a simple click, Morse may be a person's only way to communicate. The proposed rule change does not affect an operator's ability to learn and use Morse, and a high percentage of radio users will likely continue to learn Morse out of respect for tradition or because they think they might need it someday. I do not think that Morse code will become a lost art after this rule change goes into effect. I think people will continue to learn and use Morse because it does have some practical applications.

*Using Morse code is not essential to safe and effective operation.* A user can operate amateur radio safely and effectively without knowing Morse code. Isn't the point of requiring people to get licenses to operate machines -- so that he or she can operate it safely and effectively? I don't see how requiring amateur radio users to know Morse code improves the operation or safety of the radio network. It makes perfect sense to me that the FCC administers *some* minimum test before someone can use the airwaves. After all, the airwaves are by nature owned by the public. I'm glad that there are minimum requirements for using them so that the immature dunces of the world can't just start broadcasting junk over every channel. However, I don't see how requiring everyone to learn Morse code accomplishes anything more than the other minimum requirements already accomplish in terms of making sure applicants possess a minimum level of sincere interest. In my view, requiring an amateur radio operator to learn Morse code is about as necessary as requiring a kid to learn all the major scales before buying a Gibson.

*Conclusion.* As America moves into the twenty-first century, we need to utilize every advantage we have in order to maintain an orderly, productive country. This is especially true in the field of communications. The recent hurricanes and the potential for terrorist activity within our borders have shown us just how fragile our communications hub can be. Having a backup network made up of amateur radio users is a great idea. Even though there are already a large number of "Hammies" out there, there is room for many more, especially in the younger generation. I am thirty years old and do not know anyone my age who operates a ham radio. The current Morse code requirement cannot be helping attract young persons to the hobby. The requirement is likely having the opposite effect. The FCC could use this rule change not only to bring the rules up to speed with the rest of the world, but also as a recruiting tool. Why not advertise the lighter requirements in youth-targeted magazines and try to bring in a new generation? Finally, I do not believe that this rule change will be the end of Morse code. Everyone who wants to learn and use Morse code is free to do so. Morse code has many uses that will withstand this rule change. Therefore, I support the proposed rule change.

Sincerely,

A handwritten signature in black ink that reads "John Inman". The signature is written in a cursive, flowing style with a large initial 'J'.

John Inman